



Janice K. Brewer  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Patrick J. Cunningham  
Acting Director

January 22, 2009  
VRP 09:125

Mr. Ron Lewis, Director  
City of Tucson General Services  
4004 S. Park Avenue, Bldg. 1  
Tucson, AZ 85714

RECEIVED  
JAN 29 2009  
ENVIRONMENTAL SERVICES

Re: **No Further Action Determination in Soil**  
City of Tucson Central Energy Plant System  
Tucson Convention Center VRP Site  
Site Code: 508392-00

Dear Mr. Lewis:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) hereby grants the City of Tucson General Services Department a No Further Action (NFA) determination for soil for the areas depicted on the attached figure, located on the property occupied by the City of Tucson Central Energy Plant System (the Site), in Tucson, Arizona.

The soil NFA is for nitrates and nitrites. ADEQ has determined the Site has met all the requirements specified in Arizona Revised Statute (A.R.S.) §49-181. The soils within the NFA boundary area are below the 1997 residential Soil Remediation Levels (SRLs) according to the requirements specified in Arizona Administrative Code Title 18, Chapter 7, Article 2 (R18-7-201 et seq.). Please note the NFA is granted with the limitations described at A.R.S. §49-181(E) and A.R.S. §49-181(F) and does not address any other area of land, groundwater or any other contaminants.

The NFA determination is based on the following:

1. In August 2006, City of Tucson (COT) General Services employees discovered a release of sodium nitrate coolant water was occurring, originating from the Loop 2 segment of the City of Tucson Central Energy Plant system. The system lost an estimated 25,000 to 30,000 gallons of water per month. COT estimated the loss of sodium nitrate at approximately 1.3 pounds per day.
2. Soil samples were collected during the abandonment and/or excavation of the Loop 2 piping from native soil beneath joints or suspect areas and during select groundwater monitoring well activities. Soil samples were analyzed for nitrites and nitrates by EPA Method. Sample analytical results were reported below the respective 1997 residential SRLs.
3. An area of the Loop 1 pipeline was investigated with two samples (MH-SE-1 and ME-SE-2) collected directly beneath a repair to the pipeline made in 2005. All soil data from this area were below the 1997 residential SRLs for nitrate and nitrite.

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4. In accordance with A.R.S. § 49-176(B), City of Tucson provided general public notice of the Request for No Further Action Determination. The public notice was placed in *Tucson Citizen* on November 19, 2008. The public comment period ended on December 19, 2008. No comments were received by either City of Tucson or ADEQ.

Pursuant to A.R.S. §49-181(F), a NFA determination under this section means that no further action shall be taken by the Department under this title to remediate or require remediation of the site or portion of the site covered by the NFA determination, unless the NFA determination is rescinded or amended pursuant to A.R.S. § 49-181(E). A NFA determination does not release or discharge any person from liability for a release of contaminants not covered by the work plan approved pursuant to A.R.S. §49-177 or outside the boundary of the site or portion of the site covered by the determination. A NFA determination shall not preclude the Director from obtaining access to the area covered by the determination under this section or any other law.

Pursuant to A.R.S. §49-181(E), the Department may rescind or amend the NFA determination for any of the following reasons: 1) On discovery of new information that would result in the potential denial of an NFA request; 2) Information originally submitted to the Director was inaccurate, misleading or incomplete; 3) The reopening of an investigation or the taking of a remedial action is necessary to respond to a release or the threat of a release of a contaminant that may present an imminent and substantial danger to the public health or welfare or the environment. Pursuant to A.R.S. §49-184, the ADEQ reserves the right to recover penalties or to take any action authorized by law for any violation of A.R.S. Title 49.

If you have any questions, please contact me at (602) 771-4809.

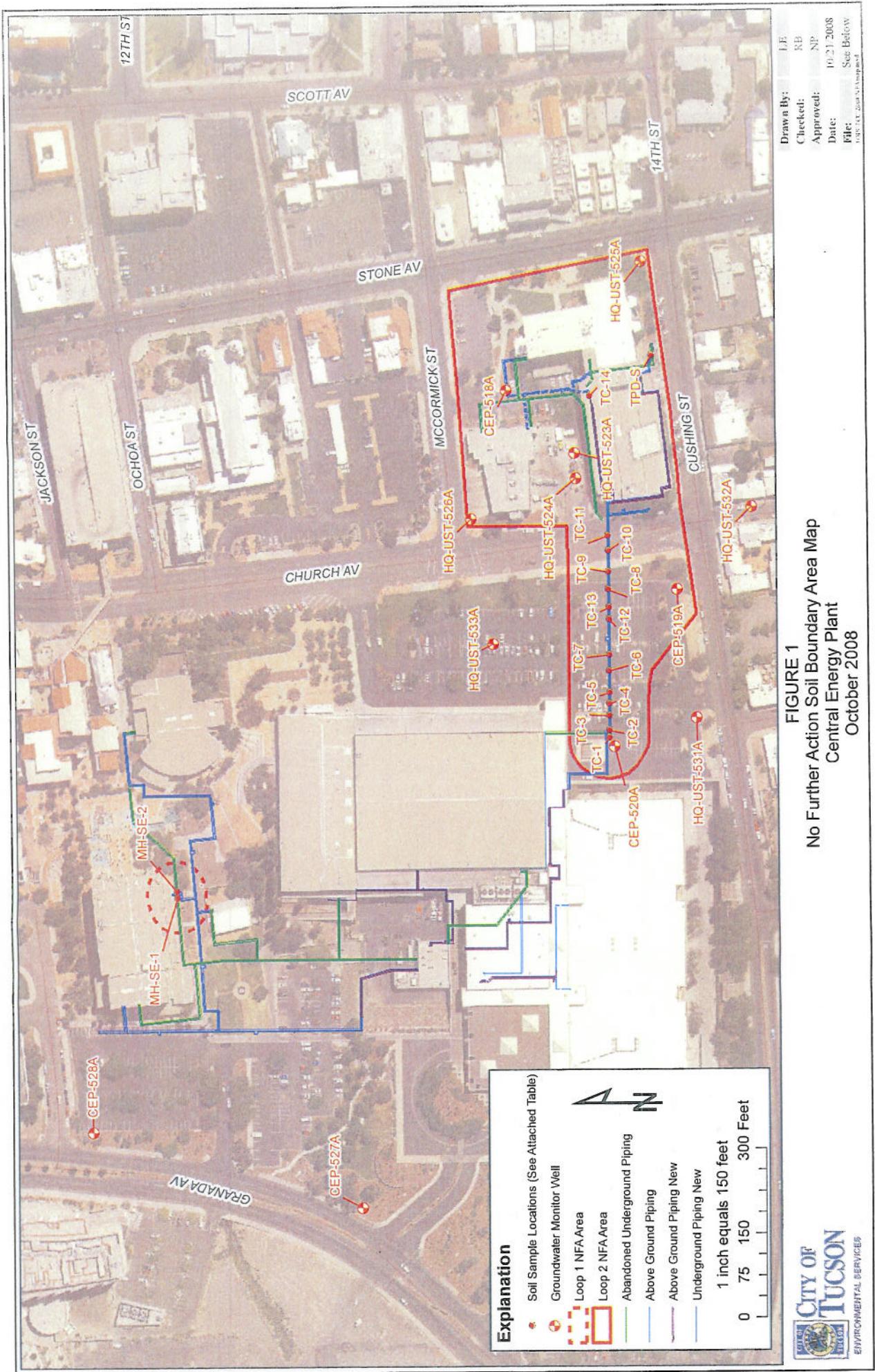
Respectfully,



Jennifer Barr, Manager  
Voluntary Remediation Program  
Waste Programs Division

cc: Ms. Nancy Petersen, Deputy Director, City of Tucson Environmental Services  
Mr. Richard Byrd, Senior Hydrologist, City of Tucson Environmental Services

Attachments: NFA Boundary Map  
Table of NFA Constituents



**Table 1**  
**SOIL**  
**Confirmation Sampling for NFA Determination**  
**Constituents of Concern**  
**Tucson Convention Center VRP Site**  
**Site Code: 508392-00**

Date Collected	Date Prepped	Data Analyzed	Laboratory	Analytical Method	COC	Consultant	Field Work Associated with Sampling
December 12 - 19, 2006	12/28/2006 12/28/2006	01/05/2007 12/30/2006	TransWest Geochem AZM133/AZ0133	EPA353.2NC EPA354.1NC	Nitrate (as N) Nitrite (as N)	EEC	Well installations for CEP Wells (CEP-518 and CEP-519)
01/18/2007	02/01/2007	02/01/2007	TransWest Geochem AZM133/AZ0133	EPA353.2NC EPA354.1NC	Nitrate (as N) Nitrite (as N)	EEC	Pipeline Loop 2 Release Investigation: TCC-1 through TCC-8
02/14/2007	02/20/2007	02/23/2007	TransWest Geochem AZM133/AZ0133	EPA353.2NC EPA354.1NC	Nitrate (as N) Nitrite (as N)	EEC	Pipeline Loop 2 Release Investigation: TCC-9 through TCC-11
12/15/2007*	02/20/2007	02/23/2008	TransWest Geochem AZM133/AZ0133	EPA353.2NC EPA354.1NC	Nitrate (as N) Nitrite (as N)	EEC	Pipeline Loop 2 Release Investigation: TCC-12 and TCC-13
03/02/2007	03/09/2008 03/09/2008	03/09/2008 03/09/2008	TransWest Geochem AZM133/AZ0133	EPA353.2NC EPA354.1NC	Nitrate (as N) Nitrite (as N)	EEC	Pipeline Loop 2 Release Investigation: TCC-12 (submitted as a separate sample)
May 31 - June 1, 2007	06/06/2007 06/11/2007	06/06/2007 06/13/2007	TransWest Geochem AZM133/AZ0133	EPA353.2NC SM4500-NO2 B NC	Nitrate (as N) Nitrite (as N)	EEC	HQUEST well HQUEST-526
06/05/2007	06/11/2007	06/18/2007	TransWest Geochem AZM133/AZ0133	EPA353.2NC SM4500-NO2 B NC	Nitrate (as N) Nitrite (as N)	EEC	HQUEST well HQUEST-525
June 18 -19, 2007	no date 06/25/2007	06/25/2007 06/27/2007	TransWest Geochem AZM133/AZ0133	EPA353.2NC SM4500-NO2 B NC	Nitrate (as N) Nitrite (as N)	EEC	Well installations for CEP wells (CEP-527 and CEP-528)
09/11/2007	no date 09/21/2007	09/18/2007 09/21/2007	TransWest Geochem AZM133/AZ0133	EPA353.2NC SM4500-NO2 B NC	Nitrate (as N) Nitrite (as N)	COT-ES	Confirmation samples from beneath Pipeline Loop 1 (MH-SE-1 and MH-SE-2)

**LEGEND:**

- COC Constituent of Concern
- EEC Environmental & Engineering Consultants, Inc on behalf of COT-ES
- COT-ES City of Tucson Environmental Services (on behalf of COT General Services Dept)
- CEP Wells installed relating to nitrite release at Central Energy Plant
- HQUEST Wells installed relating to UST release related to Fire Department headquarters
- This date appears to be a typographical error on the Chain of Custody. It does not fall chronologically in line with the collection of other samples and the lab submittal date.
- 12/15/2007\* Additionally, the chain of custody work order was signed by EEC on February 15, 2007. Finally, the text of the Closure Report submitted by COT indicates these samples were collected in February of 2007, not December of 2007.